# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

)
) Chapter 11
)
) Case No. 25-10068 (CTG)
)
) (Jointly Administered)
)
Re: Docket No. 929

# CERTIFICATION OF COUNSEL REGARDING FIFTH NOTICE OF ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES RELATING TO DT ASHLEY CROSSING LLC

The undersigned counsel to Ann Aber in her capacity as Plan Administrator in the above-captioned cases (the "<u>Plan Administrator</u>"), hereby certifies as follows:

- 1. On May 16, 2025, the debtors and debtors-in-possession in the above-captioned cases (the "Debtors") filed the Fifth Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases [Docket No. 929] (the "Fifth Assumption Notice") regarding the assumption and assignment of certain unexpired leases set forth in the Fifth Assumption Notice (the "Original Assumption List"). Attached to the Fifth Assumption Notice was a proposed form of order (the "Assumption Order") authorizing the assumption and assignment of the Original Assumption List.
- 2. The deadline to object to the Fifth Assumption Notice was May 30, 2025 (the "Objection Deadline").

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

- 3. Prior to the Objection Deadline, landlord for store number 2328, DT Ashley Crossing LLC (the "Landlord"), provided informal comments to the Fifth Assumption Notice.
- 4. Attached hereto as <u>Exhibit A</u> is a revised assumption order (the "<u>Revised Assumption Order</u>"), which the Landlord has confirmed resolves its informal comments. A redline comparing the Revised Assumption Order to the Assumption Order is attached hereto as <u>Exhibit</u> <u>B</u>.
- 5. Any leases subject to unresolved objections or informal comments received regarding the Fifth Assumption Notice (collectively, the "Outstanding Leases") are not included in the Revised Assumption Order. For the avoidance of doubt, the Fifth Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases.
- 6. Accordingly, the Plan Administrator requests entry of the Revised Assumption Order attached hereto as **Exhibit A** at the Court's earliest convenience.

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Dated: August 29, 2025 Wilmington, Delaware

#### **COLE SCHOTZ P.C.**

# /s/ Jack M. Dougherty

Patrick J. Reilley (No. 4451) Stacy L. Newman (No. 5044) Jack M. Dougherty (No. 6784) Michael E. Fitzpatrick (No. 6797) 500 Delaware Avenue, Suite 600 Wilmington, Delaware 19801 Telephone: (302) 652-3131

Facsimile: (302) 652-3117

Email: preilley@coleschotz.com

snewman@coleschotz.com jdougherty@coleschotz.com mfitzpatrick@coleschotz.com

-and-

## HAHN LOESER & PARKS LLP

Christopher B. Wick, Esquire (admitted *pro hac vice*) 200 Public Square, Suite 2800

Cleveland, OH 44114

Telephone: (216) 621-0150 Facsimile: (216) 274-2488

cwick@hahnlaw.com

## HAHN LOESER & PARKS LLP

Philip K. Stovall, Esquire (*pro hac vice* admission pending) 65 East State Street, Suite 2500

Columbus, OH 43215

Telephone: (614) 221-0240

pstovall@hahnlaw.com

Counsel for Ann Aber, solely in her capacity as the Plan Administrator of JOANN Inc., et al.